

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

WARREN RICHARDS, on behalf of himself  
and others similarly situated,

Plaintiff,

v.

GOOSE CREEK CANDLES LLC

Defendant.

Case No.: 25-cv-1188

Judge: James Russell Sweeney, II

Magistrate Judge: Mark J. Dinsmore

**PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST**

1. Warren Richards  
c/o PARONICH LAW, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
Phone: (617) 485-0018
2. Goose Creek Candles LLC ("Defendant")  
c/o STITES&HARBISON PLLC  
400 West Market Street, Suite 1800  
Louisville, KY 40202-3352
3. Ghostmonitor Inc. d/b/a Recart,  
251 Little Falls Drive  
Wilmington, Delaware 19808
4. Any representative of Defendant who made text messages to the Plaintiff's telephone  
(name and contact information unknown to Plaintiff at this time)
5. Any witness disclosed or called by Defendant.
6. Plaintiff reserves the right to supplement the witness list until the deadline set forth in the  
Court's Case Management Plan for final witness and exhibit lists.

Exhibits Plaintiff expects to rely on at trial:

1. Telephone records reflecting certain calls Defendant made, or caused to be made, that used  
an advertising text message;
2. Defendant's responses to Plaintiff's Discovery Requests.

3. Any documents produced by or identified by Defendant in response to Plaintiff's Discovery Requests.
4. Any documents produced by or identified by Defendant through its Initial Disclosures.
5. Any exhibit listed by Defendant.
6. Plaintiff reserves the right to supplement his exhibit list until the deadline set forth in the Court's Case Management Plan for final witness and exhibit lists.

Dated: October 4, 2025

/s/ Anthony Paronich

Anthony I. Paronich

PARONICH LAW, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

Tel: (617) 485-0018

Fax: (508) 318-8100

anthony@paronichlaw.com

Counsel for Plaintiff and the proposed class